## **EXHIBIT 3: DECLARATION OF JAMES NOSEDA REGARDING NO BASIS CLAIMS**

4819-5893-3025.5

## IN THE UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

	X	
	:	Chapter 9
IN RE	:	
	•	Case No. 13-53846
CITY OF DETROIT, MICHIGAN,	:	
,	:	Hon. Steven W. Rhodes
DEBTOR	:	
	X	

## DECLARATION OF JAMES NOSEDA IN SUPPORT OF DEBTOR'S TENTH OMNIBUS OBJECTION TO CERTAIN CLAIMS

## (No Basis Claims)

- I, James Noseda, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury that the following is true and correct to the best of my knowledge, information and belief:
- 1. I am an attorney with the City of Detroit Law Department. Unless otherwise stated in this Declaration, I have personal knowledge of the facts set forth herein.
- 2. The City's ongoing claims reconciliation process involves the collective effort of a team of employees assembled from personnel specifically familiar with the operations and liabilities of the City. This team works together and in conjunction with City's counsel, the City's financial advisor, and the City's claims agent, to review proofs of claim filed against the City (each, a "Claim" and collectively, the "Claims").
- 3. In connection with the preparation of the Tenth Omnibus Objection to Certain Claims (No Basis Claims) (the "Tenth Omnibus Objection"), the City and its financial professionals reviewed the claims at issue, as described on Exhibit 2 of the Tenth Omnibus Objection. I have also personally reviewed the Tenth Omnibus Objection and the exhibits attached thereto. Accordingly, I am familiar with the information contained therein.

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- 4. City employees, working with certain of the City's professionals, compared each of the claims listed in Exhibit 2 of the Tenth Omnibus Objection (the "No Basis Claims") to the following City data sources in order to determine whether such claim may be valid and outstanding: City Law Department litigation files, court dockets, records of the City Clerk, and finance records.
- 5. After comparing each of the No Basis Claims to the City's available information, the City believes that the No Basis Claims do not identify a valid basis for any liability of the City for the reasons stated in Exhibit 2 to the Tenth Omnibus Objection.

[SIGNATURE PAGE FOLLOWS]

6. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

Dated: February 10, 2015

James Noseda